

DANNIS WOLIVER KELLEY
115 PINE AVENUE, SUITE 500
LONG BEACH, CA 90802

Sue Ann Salmon Evans, State Bar No. 151562
sevans@DWKesq.com
Keith A. Yeomans, State Bar No. 245600
kyeomans@DWKesq.com
DANNIS WOLIVER KELLEY
115 Pine Avenue, Suite 500
Long Beach, CA 90802
Telephone: 562.366.8500
Facsimile: 562.366.8505

David R. Holmquist, State Bar No. 179872
david.holmquist@lausd.net
LOS ANGELES UNIFIED SCHOOL DISTRICT
OFFICE OF GENERAL COUNSEL
333 S. Beaudry Avenue, 24th Floor
Los Angeles, CA 90017
Telephone: 213.241.6601
Facsimile: 213.241.8444

Attorneys for Plaintiff-Intervenor
Los Angeles Unified School District

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

WILBUR L. ROSS, JR., et al.,

Defendants.

Case No. 3:18-cv-01865-RS

**DECLARATION OF PIA ESCUDERO IN
SUPPORT OF LOS ANGELES UNIFIED
SCHOOL DISTRICT'S OPPOSITION TO
MOTION FOR SUMMARY JUDGMENT**

Judge: Hon. Richard Seeborg
Courtroom: 3
Date: December 7, 2018
Time: 10:00 a.m.

Complaint filed March 26, 2018
First Amended Complaint filed May 4, 2018

Trial date: January 7, 2019

DECLARATION OF PIA ESCUDERO

I, Pia V. Escudero, declare as follows:

1. I am the Executive Director of the Division of Student Health and Human Services for the Los Angeles Unified School District ("LAUSD" or "District"), the plaintiff-intervenor in this matter of *State of California v. Ross*, U.S. District Court for the Northern District of California, case no. 3:18-cv-01865. I have personal knowledge of the facts set forth in this declaration and if called as a witness could competently testify as follows.

2. In my capacity as Executive Director of the Division of Student Health and Human Services for LAUSD, I am familiar with the District's student enrollment and demographic data. Much of the District's enrollment and demographic data, at the District level, is publicly available on the LAUSD Open Data website, at <https://my.lausd.net/opendata/dashboard>. District enrollment and demographic data at the District level.

3. For the 2017-18 school year, the District's total enrollment was 513,592 students. The following represents the total number of District students in 2017-18 with the identified demographic characteristics:

- a. Economically Disadvantaged students = 422,239 (82.21% of student body)
- b. English Learners (incl. reclassified) = 248,282 (48.34% of student body)
- c. Students with Disabilities = 65,886 (12.83% of student body)
- d. Hispanic/Latino students = 377,142 (73.43% of student body)
- e. White students = 51,588 (10.04% of student body)
- f. African American/Black students = 40,081 (7.8% of student body)
- g. Asian students = 19,204 (3.74% of student body)

4. For the 2016-17 school year, the District's total enrollment was 523,099 students. The following represents the total number of District students in 2016-17 with the identified demographic characteristics:

- a. Economically Disadvantaged students = 435,537 (83.26% of student body)
- b. English Learners (incl. reclassified) = 257,709 (49.26% of student body)
- c. Students with Disabilities = 66,349 (12.68% of student body)

d. Hispanic/Latino students = 386,897 (73.96% of student body)

e. White students = 52,536 (10.04% of student body)

f. African American/Black students = 41,903 (8.01% of student body)

g. Asian students = 19,681 (3.76% of student body)

5. LAUSD is the second largest school district in the country and is broken down into 7 separate Board Districts.

6. In Board District 1, over half (61%) of the population are renters, almost a quarter (21.4%) of residents live in apartment buildings, and over 2,000 students experience homelessness.

7. In Board District 2, the vast majority of residents are renters (80%) and Hispanic/Latino (70.9%). A high proportion of Board District 2 residents live in multi-unit housing (40.6%), have limited English proficiency (32.5%), and over 3,000 students experience homelessness.

8. In Board District 3, almost half of residents (44%) are renters, almost a third (28.7%) of residents live in apartment buildings, and more than 1,500 students experience homelessness.

9. In Board District 4, over half (54.08%) of residents are renters, over a third (34.27%) of residents live in apartment buildings, and more than 800 students experience homelessness.

10. In Board District 5, over a quarter (25.85%) of families have children under age 6 and are Latino (68.87%), and more than 2,000 students experience homelessness.

11. In Board District 6, many residents are renters (42.39%), almost a quarter of families (21.5%) have children under the age of 6, and more than 3,500 students experience homelessness.

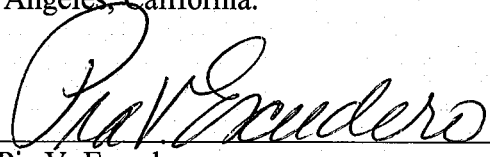
12. In Board District 7, more than half (55.2%) of residents are renters, over a quarter (28.4%) of families have children under age 6. The neighborhood of Watts has a census block group with the highest Low Response Score (44.2) in the City of Los Angeles, and more than 3,500 students experience homelessness.

1 13. As compared to other school districts within the United States, LAUSD has a
2 disproportionately high number and percentage of vulnerable student populations that come from
3 immigrant families, students whose families rent apartments, students whose families reside in
4 multi-unit housing, as well as homeless students, economically disadvantaged students, English
5 Learners, Latino, and African American students.

6 14. Recent and highly publicized immigration related policies and political rhetoric
7 coming from the current administration has generated an environment of fear and distrust in
8 LAUSD's diverse community, demonstrated by our outreach to parents at school sites, parents
9 declaring fear of accessing health & mental health programs, dealing with public agencies and
10 fear to access Medi-Cal & other benefits.

11
12
13 I declare under penalty of perjury, under the laws of the State of California and the United
14 States, that the foregoing is true and correct.

15 Executed November 15, 2018, in Los Angeles, California.

16
17 
18 Pia V. Escudero

DANNIS WOLIVER KELLEY
115 PINE AVENUE, SUITE 500
LONG BEACH, CA 90802